

Exhibit 2

PLAINTIFFS' INITIAL LIST OF PROPOSED ADDITIONAL SEARCH TERMS¹

In re Facebook Biometric Information Privacy Litig.

Master File No. 3:15-cv-03747-JD (N.D. Cal.)

- Bio* /20 privacy
- Privacy /3 (law or legis*)
- Biomet*
- Geomet*
- Photomet*
- (Face or faces or facial*) /20 (template* or print* or geom* or enrol* or scan* or match* or detect* or recog* or sig* or data* or represent* or social* or imag* or infra* or stor* or back* or serv* or graph* or wiki* or class*)
- Template* /5 (data* or stor* or back* or serv*)
- Xray or X-ray or "x ray"
- Everstore
- Imag* /20 process*
- Async
- Recog* /5 (serv* or candidate*)
- Detect* /5 tier*
- Model* /5 (fetch* or recog* or train*)
- CCD
- CMOS
- "Feature Vector"
- Facerec
- project* w/5 recog*"Representation Layer"
- "Verification Metric"
- Weighted- χ^2 /5 similar*
- Siamese /5 net*
- metric /5 (unsupervis* or supervis*)
- SFC
- FaceCommander
- Tag* /5 suggest*
- Timeline and "Tagging Settings"
- Ireland /50 (data* or protect* or fac* or DPC)
- facerec
- waterfallID
- facebox*
- (Face or faces or facial*) /20 (product* or recog*) /20 tier
- Include_unrecognized_faceboxes
- Include_face_crop_src
- Include_recognized_user_profile_picture

¹ Each of these search terms and strings should be applied in a case-insensitive fashion.

- Include_low_confidence_recognitions
- /photos/tagging/recognition
- Detect_request
- Dev057.pm1.facebook.com
- Binlogviewer
- RemoteBinlogSource
- Detect* /20 tier /20 dashboard
- Roger /2 Bickel

PLAINTIFFS' INITIAL LIST OF PROPOSED ADDITIONAL CUSTODIANS

- Ming Yang
- Marc' Aurelio Ranzato
- Lior Wolf
- Matt Hicks
- Gil Hirsch
- Lior Ben-Kereth
- Kate O'Neill
- Amin Zoufonoun